

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TX 75202-2733

12,000

July 14, 2000

ATMEL CORPORATION
6431 LONGHORN DR
IRVING, TX 75063ATTN: HUGO W GOPFFARTH,

This is to acknowledge that, in compliance with Section 3010 of the Resource Conservation and Recovery Act (RCRA), you have filed a Notification of Regulated Waste Activity for:

ATMEL CORPORATION 6431 LONGHORN DR IRVING, TX 75063-

Your EPA Identification Number for this installation is: TXD982556524

The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Bienniel Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage, and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste reports and documents required under Subtitle C of RCRA. A Subsequent Notification of Regulated Waste Activity is requested should any information on the original document change.

Charles Faultry, Chief

RCRA Information Management Section

38530

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

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Phone Number (Area Code and Number)

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C. Owner Type

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D. Change of Owner Indicator

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(Date Changed)
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		ID - For Official Use Only
VIII. Type of Regulated Waste Activity (Ma	rk 'X' in the appropriate boxes. Refer to	Instructions)
A. Hazardous W	aste Activity	B. Used Oil Recycling Activities
1. Generator (See Instructions) a. Greater than 1000kg/mo (2,200 lbs.) b. 100 to 1000 kg/mo (220-2,200 lbs.) c. Less than 100 kg/mo (220 lbs) 2. Transporter (Indicate Mode in boxes 1-5 below) a. For own waste only b. For commercial purposes Mode of Transportation 1. Air 2. Rall 3. Highway 4. Water 5. Other - specify	□ 3. Treater, Storer, Disposer (installation) Note: A permit required for this activity, se instructions. 4. Hazardous Waste Fuel □ a. Generator Marketing to Burne □ b. Other Marketers □ c. Boilerand/orIndustrialFurnace □ 1. Smelter Deferral □ 2. Small Quantity Exemptic Indicate Type of Combustic Device(s) □ 1. Utility Boiler □ 2. Industrial Boiler □ 3. Industrial Furnace □ 5. Underground Injection Control	a. Marketer Directs Shipment of Used Oil to Off-Specification Burner b. Marketer Who First Claims the Used Oil Meets the Specifications Used Oil Burner - Indicate Type(s) of Combustion Device a. Utility Boller b. Industrial Boller c. Industrial Furnace Used Oil Transporter - Indicate Type(s) of Combustion Device(s) a. Transporter b. Transfer Facility Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(les)
Description of Regulated Wastes (Use a A. Characteristics of Nonlisted Hazardon		
	aracteristic contaminant(s))	waste number(s) for the Toxicity characteristic to list more than 12 waste codes.) 5 6 11 12
C. Other Wastes. (State or other wastes requ	ulring a handler to have an I.D. number;	See Instructions.)
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XI. Comments		n aren a ken Tufan kalabakan dari dari ka
Note: Mail completed form to the appropriate E		on III of the booklet for addresses.)

RECORD OF COMMUNICATION	x	Phone call	Conference	DATE:	4/2/92
COMMUNICATION		Discussion	Other	TIME:	9:20 AM
TO: Hitachi File,	TXD9	82556524 FRO	OM: Bryon Hei	neman,	6H-CX

Background:

Hitachi Semiconductor submitted a revised 8700-12 notification form for BIF activity at their U2 facility in Irving, Texas. The notification was date stamped received in the Region on June 17, 1991. The cover letter submitted by Mr. Clay with this notification indicated that Hitachi intended to submit the required Part A application and Certification of Precompliance by August 21, 1991. Neither of these subsequent documents have been received by the Region. Mr. Clay was contacted to ascertain the need for a 3007 information request.

Summary of Communication:

Mr. Clay indicated that the U2 facility is a semiconductor facility and generates waste solvents IPA, methanol, and others (D001, D002, F003). These solvents are currently stored onsite, and disposed of offsite by Gilbraltar Resources, a fuel blender. The U2 facility operates a natural gas fired boiler onsite. Hitachi had submitted the BIF notification with the intent of utilizing the onsite boiler for the generated waste streams. Mr. Clay indicated that Hitachi has not pursued BIF activity because of the recent Texas moratorium on hazardous waste permits. Mr. Clay claimed that Hitachi has not burned hazardous waste in its boiler. He asked if BIF activity could still be pursued. I referred him to Ruben Casso of 6H-P.

Conclusions, action taken or required: Recommend 3007 information request.

Information copies to: Keith Phillips, 6H-CX, Guy Tidmore, Agatho Benjamin, 6H-CT, Ruben Casso, 6H-PT.

FACT SHEET

HITACHI SEMICONDUCTOR U2 FACILITY Irving, Texas EPA ID# TXD982556524

- * Hitachi submitted of a Notification of Regulated Waste Acivity dated May 14, 1991.
- * Hitachi's May 14, 1991 notification included an onsite industrial boiler utilizing hazardous waste as fuel.
- * Hitachi failed to submit a Part A and a Certification of Precompliance by the August 21, 1991 regulatory deadline required for notifiers planning to continue to burn hazardous waste in a boiler or industrial furnace.
- * Hitachi was referred to 6H-C by 6H-P on September 12, 1991 as a BIF notifier, potential non-complier.
- * Hitachi claims that between May and August of 1991 a corporate decision was made not to pursue BIF interim status. Hitachi indicates that hazardous wastes have not been burned in an onsite BIF since August 21, 1991.
- * A 3007 information request has been drafted to obtain:
 - information regarding Hitachi's compliance/non-compliance with the BIF rule, and
 - 2) certification that Hitachi has not and does not intend to burn hazardous waste in a BIF.

inch) in the unshaded areas only

FORTH - - OVERL CMB NO 2050 GOZE EXPIRES TO 31 91 GSA No 0248 - EPA - OT

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010

Notification of Regulated Waste

Date Received (For Official Use Only)

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certify under penalty of law that I in the second all attached documents, and obtaining the information, I believe that there are significant penaltimprisonment.	I that based on my I re that the submitted	Inquiry of those I information is t	Individ	iuals in curate.	nmediate and con	ny respo	onsible :
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Hitachi Semiconductor (America) Inc.

P.O. Box 167928 6321 East Campus Circle Drive Irving, Texas 75016-7928 Telephone: (214) 518-1501 METRO (214) 751-1610 FAX (214) 550-8972

May 14, 1991

Mr. Ruben Casso EPA Region VI 1445 Ross Avenue, 12th Floor Suite 1200 Dallas, Texas 75202

Re:

Burning of Hazardous Waste In Boilers and Industrial Furnaces

Notification of Regulated Waste Activity

EPA ID Number TXD982556524

Dear Mr. Casso:

In compliance with the recently revised BIF Regulation, 40 CFR Part 260, Hitachi Semiconductor (America), Inc. wishes to submit the completed Section 3010 Notification, Form 8700-12 (7/90). By submitting this form, Hitachi will meet the May 22, 1991 deadline required as part of applying for Interim Status at the U2 Facility.

Currently, Hitachi is listed as a generator of the waste solvents listed in the attached form and is currently permitted to dispose of these materials. At Hitachi's U2 Facility, an active boiler currently exists, burning natural gas and is registered with the Texas Air Control Board (TACB) under a permit exemption. Hitachi will submit the required Part A application and other necessary requirements by the next deadline, August 21, 1991. After Interim Status is granted, Hitachi intends to convert the active boiler for recycling these hazardous wastes on-site by incineration for generating steam or heat to be utilized rather than disposing of these hazardous wastes off-site.

Hitachi Semiconductor (America), Inc. hopes that you find the enclosed information sufficient to comply with the requirements necessary to obtain Interim Status for the existing boiler. Hitachi is currently scheduling the preparation of the Part A application and public notification as required.

RCRA PROGRAMS BRANCH Mr. Ruben Casso May 14, 1991 Page 2

Should you have any questions or comments concerning the above, please call me at (214) 580-0088.

Sincerely,

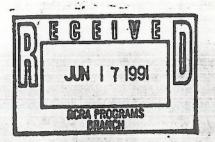
HITACHI SEMICONDUCTOR (AMERICA), INC.

Jim Clay

Facilities Engineer

Encl.

cc: Mr. Wayne Harry - Texas Water Commission



September 25, 1992

MEMORANDUM

SUBJECT: Hitachi Response to 3007 Letter Regarding BIF Activities

FROM: Sryon Heineman, 6H-CX

TO: Keith Phillips, 6H-CX

I have reviewed Hitachi's response to our 3007 letter. Hitachi had notified as a boiler/industrial furnace (BIF) burning hazardous waste in May, 1991. No further correspondence had been received after August 21, 1991 from Hitachi. If Hitachi has burned hazardous waste after the effective date of the BIF rule, this would have been a violation of 40 CFR §266.103. The 3007 letter was issued to determine if Hitachi has burned hazardous waste after the effective date of the BIF rule. According to Hitachi's response, they have not burned hazardous waste in a BIF since August 21, 1991.

I recommend no further enforcement action at this time. However, during future routine RCRA CEI's I recommend that Hitachi's response to the 3007 letter be reverified.

cc: Agatha Benjamin, 6H-CT.



Hitachi Semiconductor (America) Inc.

P.O. Box 167928 6321 East Campus Circle Drive Irving, Texas 75016-7928 Telephone: (214) 518-1501 METRO (214) 751-1610 FAX (214) 550-8972



17 August 1992

Keith Phillips, Chief Technical Enforcement Section, Mailcode 6H-CX RCRA Enforcement Branch Hazardous Waste Management Division U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

- Re: 1) Request for Information Pursuant to Section 3007 of RCRA for Hitachi U2 Facility, EPA ID# TXD982556524.
 - 2) In Response to U.S. EPA Certified Letter Dated 7/27/92.

Attn. Bryon Heineman, P.E.

In general, the response to your certified letter of 7/27/92 is that Hitachi's letter of May 14, 1991 concerning the intent to burn hazardous wastes; i.e. two waste solvent streams at Hitachi's U2 Facility, was to provide a position to move ahead with this program if subsequent evaluation of economics confirmed this plan to be a viable alternative for Hitachi. Shortly thereafter it was determined to be in the best interest of Hitachi to abandon this plan due primarily to:

- 1. Relative poor return on investment.
- 2. Very high operating costs for regulatory compliance even though these two waste solvent streams are very pure, the only contaminate being water and make excellent fuel supplements for natural gas fired boilers.

Answers to questions #1 through #8 follow:

Question #1

W. Hugo Gopffarth, Facilities Manager, Hitachi Semiconductor (America), Inc.

Question #2

W. Hugo Gopffarth and Jim Clay, Facilities Engineer, Hitachi Semiconductor (America), Inc.

Question #3

Documents consulted were:

- 1. Notification of Regulated Waste Activity dated 5/14/91.
- 2. Annual Waste Summary, 1991 (Attached)
- 3. Waste Manifest 00007474, 8/7/92 (Attached)

Questions #4

- #4a. None. No wastes have been burned.
 - 4b. Boilers are fired by natural gas. No wastes have been burned.
- 4c. None. No wastes have been burned.
- 4d. None. No wastes have been burned.
- 4e. None. No wastes have been burned.

Questions #5

Waste solvents defined in the 5/14/91 Notification of Regulated Waste Activity have been processed off-site by Gibraltar Chemical Resources, Inc. as described on the attached 1991 Annual Waste Summary.

Question #6

Texas Waste Manifest 00007474 is attached. This document was generated to cover Hitachi's most recent shipment to Gibraltar Chemical Resources, Inc.

Question #7

No Hitachi wastes have been burned. No other wastes have been burned on-site by Hitachi.

Question #8b

Enclosed is a revised Notification of Regulated Waste Activity indicating our status as a non-burner of hazardous waste fuel in Section V111.A of EPA form 8700-12.

"I certify under penalty of law that hazardous waste has not been burned or processed in on-site boilers and industrial furnaces at this facility since August 21, 1991, nor will be in the future without a proper permit. This information was prepared under my

direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manages the facility, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

W. Hugo Gopffarth
Facilities Manager

WHG:sls

TEXAS WATER COMMISSION P.O. Box 13087, Capitol Station Austi , T xas 78711-3087





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Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

& EPA

Notification of Regulated Waste Activity

Date Received (For Official Use Only)

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United States Environmental Protection Agency

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TX 75202-2733

JUL 27 1992

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. Jim Clay Facilities Engineer Hitachi Semiconductor U2 Facility 6431 Longhorn Irving, Texas 75063

Re: Request for Information Pursuant to Section 3007 of RCRA for Hitachi U2 Facility, EPA ID# TXD982556524.

Dear Mr. Clay:

The U.S. Environmental Protection Agency (EPA) has a statutory mandate to protect public health and the environment from the adverse effects of hazardous wastes. Pursuant to Section 3007 of the Resource Conservation and Recovery Act of 1976 (RCRA), 42 U.S.C. § 6927, as amended, any person who generates, stores, treats, transports or otherwise handles, or has handled, hazardous wastes shall, upon request of any officer or employee of EPA, furnish information relating to such wastes. The term "hazardous wastes" is defined in Section 1004(5) of RCRA, 42 U.S.C. § 6903(5), and includes those substances listed in 40 CFR Part 261. You are hereby requested to respond to the Information Request set forth in Attachment A, enclosed herein. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. 3501, et seq.

Your response to this Information Request, with all available supporting documents, must be received at the following address within thirty (30) calendar days of your receipt of this letter:



Keith Phillips, Chief
Technical Enforcement Section, Mailcode 6H-CX
RCRA Enforcement Branch
Hazardous Waste Management Division
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
ATTN: Bryon Heineman, P.E.

Compliance with the Information Request set forth in Attachment A is mandatory. Failure to respond fully and truthfully to the Information Request within thirty (30) calendar days of receipt of this letter, or adequately to justify such failure to respond, can result in enforcement action by EPA pursuant to Section 3008 of RCRA. RCRA permits EPA to seek the imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of continued non-compliance with this request for information. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001 or Section 3008(d) of RCRA.

In accordance with RCRA, Section 3007, the records, reports, and/or information requested in this letter must be submitted whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 CFR Part 2. The information qualifying as business confidential material will be disclosed by EPA only to the extent and by the procedures set forth in 40 CFR Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you wish to assert a business confidentiality claim, you must clearly mark each page of each document included in your claim with a legend such as "trade secret", "proprietary", or "company confidential". Such confidential material may be submitted separately from other material.

If you have any technical questions regarding this request, please contact Bryon Heineman of my staff at (214) 655-6480.

Sincerely yours,

Allyn M. Davis, Director

Hazardous Waste Management Division

Enclosure

cc: Terry Sykes

Office of Regional Counsel

Hitachi Semiconductor TXD982556524

ATTACHMENT A INFORMATION REQUEST

Instructions:

- 1. Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request.
- Precede each answer with the number of the Question to which it corresponds.
- 3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with corrected response.
- 4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds. Please submit all information for each question in a logically sequenced, bound format.
- The information requested herein must be provided even though 5. the Respondent may contend that it includes possibly confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Section 3007 (b) of RCRA, 42 U.S.C. 6927 (b), and 40 C.F.R. 2.203 (b), by attaching to such information at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," or "proprietary" or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures set forth in statutes and regulation set forth above. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

Definitions

The following definitions shall apply to the following words as they appear in this Attachment A:

- The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors, assigns, and agent.
- The terms "Hitachi Semiconductor", "Hitachi U2 Facility" or "the facility" shall mean and include the property on or about the Hitachi U2 Facility in Irving, Texas, EPA ID# TXD982556524.
- 3. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA, 42 U.S.C. § 6903(5), and includes those substances listed in 40 CFR Part 261.
- 4. The term "solid waste" shall have the same definition as that contained in Section 1004(27) of RCRA.
- 5. The term "materials" shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Hitachi U2 Facility, including, but not limited to all hazardous wastes and solid wastes, as defined above.
- 6. With respect to a natural person, the term "identify" means, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
- 7. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) to set forth its full name, address, legal form (e.g. corporation, partnership, etc.), organization, if any, and a brief description of its business.
- 8. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.

- The terms "document" and "documents" shall mean any object 9. that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of imitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document.
- 10. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
- 11. The terms "boiler" and "industrial furnace" shall have the same definitions as described at 40 CFR Section 260.10.
- 12. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.
- 13. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in RCRA, 40 CFR Parts 260 - 280, in which case the statutory or regulatory definitions shall apply.

OUESTIONS

- #1. Identify the person(s) answering these Questions on behalf of Respondent.
- #2. For each and every Question contained herein, identify all persons consulted in the preparation of the answer.
- #3. For each and every Question contained herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Question and provide true and accurate copies of all such documents.
- #4. Provide the following additional information concerning the burning of hazardous waste in boilers and industrial furnaces as described in Hitachi Semiconductor's Notification of Regulated Waste Activity dated May 14, 1991:
- a) The source, technical description, and basis for hazardous waste determination in accordance with 40 CFR 262.11 for all characteristic and listed hazardous wastes that have been burned or processed in onsite boilers and industrial furnaces since August 21, 1990.
- The source, and technical description of all other feedstocks to onsite boilers and industrial furnaces burned or processed concurrently with hazardous waste since August 21, 1991, including auxiliary fuels and non-hazardous materials.
 - All certified laboratory analyses that provided the basis for any characteristic hazardous waste determination in accordance with 40 CFR 262.11 for all characteristic hazardous wastes that have been burned or processed in onsite boilers and industrial furnaces since August 21, 1991.
 - Certified laboratory analyses (in accordance with the analytical procedures referenced at 40 CFR 260.11) of each material burned or processed in onsite boilers and industrial furnaces since August 21, 1991, for the following criteria: gross heating value, total chlorine, ash, antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, silver, and thallium.
 - e) All information required of interim status burners of hazardous waste in boilers and industrial furnaces such as the certification of precompliance described at 40 CFR 266.103(b)(2).

- #5. A description of the disposal process and ultimate resolution of each of the listed hazardous waste streams included in Section IX.B. of the May 14, 1991 Notification of Regulated Waste Activity.
- #6 Copies of the most recent Hazardous Waste Manifests of each of the listed hazardous waste streams included in Section IX.B. of the May 14, 1991 Notification of Regulated Waste Activity if transported offsite for disposal.
- The source, technical description, and manifest copy for all characteristic and listed hazardous waste streams that have been accepted from offsite for burning or processing in onsite boilers and industrial furnaces since August 21, 1990.
 - #8 If no hazardous waste has been burned or processed in any onsite boilers and industrial furnaces since August 21, 1991, and no hazardous waste will be burned or processed in any onsite boilers and industrial furnaces, the following information:
 - a) A revised Notification of Regulated Waste Activity with the appropriate status as a burner of hazardous waste fuel marked in Section VIII.A of EPA form 8700-12.
 - b) A signed and dated original copy of the following certification by a responsible corporate officer as defined at §270.11:

"I certify under penalty of law that hazardous waste has not been burned or processed in onsite boilers and industrial furnaces at this facility since August 21, 1991, nor will be in the future without a proper permit. This information was prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manages the facility, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, I am aware that there are significant and complete. penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. Jim Clay Facilities Engineer Hitachi Semiconductor U2 Facility 6431 Longhorn Irving, Texas 75063

Re: Request for Information Pursuant to Section 3007 of RCRA for Hitachi U2 Facility, EPA ID# TXD982556524.

Dear Mr. Clay:

The U.S. Environmental Protection Agency (EPA) has a statutory mandate to protect public health and the environment from the adverse effects of hazardous wastes. Pursuant to Section 3007 of the Resource Conservation and Recovery Act of 1976 (RCRA), 42 U.S.C. § 6927, as amended, any person who generates, stores, treats, transports or otherwise handles, or has handled, hazardous wastes shall, upon request of any officer or employee of EPA, furnish information relating to such wastes. The term "hazardous wastes" is defined in Section 1004(5) of RCRA, 42 U.S.C. § 6903(5), and includes those substances listed in 40 CFR Part 261. You are hereby requested to respond to the Information Request set forth in Attachment A, enclosed herein. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. 3501, et seq.

Your response to this Information Request, with all available supporting documents, must be received at the following address within thirty (30) calendar days of your receipt of this letter:

Keith Phillips, Chief
Technical Enforcement Section, Mailcode 6H-CX
RCRA Enforcement Branch
Hazardous Waste Management Division
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
ATTN: Bryon Heineman, P.E.

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. Jim Clay Facilities Engineer Hitachi Semiconductor U2 Facility 6431 Longhorn Irving, Texas 75063

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Keith Phillips, Chief
Technical Enforcement Section, Mailcode 6H-CX
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Hazardous Waste Management Division
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
ATTN: Bryon Heineman, P.E.

6H-CX:BHEINEMAN:mat:x6480:4/13/92:a:hitachi

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Compliance with the Information Request set forth in Attachment A is mandatory. Failure to respond fully and truthfully to the Information Request within thirty (30) calendar days of receipt of this letter, or adequately to justify such failure to respond, can result in enforcement action by EPA pursuant to Section 3008 of RCRA. RCRA permits EPA to seek the imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of continued non-compliance with this request for information. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001 or Section 3008(d) of RCRA.

In accordance with RCRA, Section 3007, the records, reports, and/or information requested in this letter must be submitted whether or not you regard part or all of it as a trade secret or confidential. You may, if you desire, assert a business confidentiality claim for all or part of the information submitted in accordance with 40 CFR Part 2. The information qualifying as business confidential material will be disclosed by EPA only to the extent and by the procedures set forth in 40 CFR Part 2, Subpart B. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. If you wish to assert a business confidentiality claim, you must clearly mark each page of each document included in your claim with a legend such as "trade secret", "proprietary", or "company confidential". Such confidential material may be submitted separately from other material.

If you have any technical questions regarding this request, please contact Bryon Heineman of my staff at (214) 655-6480.

Sincerely yours,

Allyn M. Davis, Director Hazardous Waste Management Division

Enclosure

cc: Terry Sykes Office of Regional Counsel Hitachi Semiconductor TXD982556524

ATTACHMENT A INFORMATION REQUEST

Instructions:

- Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request.
- Precede each answer with the number of the Question to which it corresponds.
- 3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with corrected response.
- 4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds. Please submit all information for each question in a logically sequenced, bound format.
- The information requested herein must be provided even though 5. the Respondent may contend that it includes possibly confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Section 3007 (b) of RCRA, 42 U.S.C. 6927 (b), and 40 C.F.R. 2.203 (b), by attaching to such information at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," or "proprietary" or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures set forth in statutes and regulation set forth above. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

Definitions

The following definitions shall apply to the following words as they appear in this Attachment A:

- The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors, assigns, and agent.
- The terms "Hitachi Semiconductor", "Hitachi U2 Facility" or "the facility" shall mean and include the property on or about the Hitachi U2 Facility in Irving, Texas, EPA ID# TXD982556524.
- 3. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA, 42 U.S.C. § 6903(5), and includes those substances listed in 40 CFR Part 261.
- 4. The term "solid waste" shall have the same definition as that contained in Section 1004(27) of RCRA.
- 5. The term "materials" shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Hitachi U2 Facility, including, but not limited to all hazardous wastes and solid wastes, as defined above.
- 6. With respect to a natural person, the term "identify" means, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
- 7. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) to set forth its full name, address, legal form (e.g. corporation, partnership, etc.), organization, if any, and a brief description of its business.
- 8. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.

- The terms "document" and "documents" shall mean any object 9. that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of imitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document.
- 10. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
- 11. The terms "boiler" and "industrial furnace" shall have the same definitions as described at 40 CFR Section 260.10.
- 12. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.
- 13. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in RCRA, 40 CFR Parts 260 280, in which case the statutory or regulatory definitions shall apply.

QUESTIONS

- #1. Identify the person(s) answering these Questions on behalf of Respondent.
- #2. For each and every Question contained herein, identify all persons consulted in the preparation of the answer.
- #3. For each and every Question contained herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Question and provide true and accurate copies of all such documents.
- #4. Provide the following additional information concerning the burning of hazardous waste in boilers and industrial furnaces as described in Hitachi Semiconductor's Notification of Regulated Waste Activity dated May 14, 1991:
 - a) The source, technical description, and basis for hazardous waste determination in accordance with 40 CFR 262.11 for all characteristic and listed hazardous wastes that have been burned or processed in onsite boilers and industrial furnaces since August 21, 1990.
 - b) The source, and technical description of all other feedstocks to onsite boilers and industrial furnaces burned or processed concurrently with hazardous waste since August 21, 1991, including auxiliary fuels and non-hazardous materials.
 - c) All certified laboratory analyses that provided the basis for any characteristic hazardous waste determination in accordance with 40 CFR 262.11 for all characteristic hazardous wastes that have been burned or processed in onsite boilers and industrial furnaces since August 21, 1991.
 - d) Certified laboratory analyses (in accordance with the analytical procedures referenced at 40 CFR 260.11) of each material burned or processed in onsite boilers and industrial furnaces since August 21, 1991, for the following criteria: gross heating value, total chlorine, ash, antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, silver, and thallium.
 - e) All information required of interim status burners of hazardous waste in boilers and industrial furnaces such as the certification of precompliance described at 40 CFR 266.103(b)(2).

- #5. A description of the disposal process and ultimate resolution of each of the listed hazardous waste streams included in Section IX.B. of the May 14, 1991 Notification of Regulated Waste Activity.
- #6 Copies of the most recent Hazardous Waste Manifests of each of the listed hazardous waste streams included in Section IX.B. of the May 14, 1991 Notification of Regulated Waste Activity if transported offsite for disposal.
- #7 The source, technical description, and manifest copy for all characteristic and listed hazardous waste streams that have been accepted from offsite for burning or processing in onsite boilers and industrial furnaces since August 21, 1990.
- #8 If no hazardous waste has been burned or processed in any onsite boilers and industrial furnaces since August 21, 1991, and no hazardous waste will be burned or processed in any onsite boilers and industrial furnaces, the following information:
 - a) A revised Notification of Regulated Waste Activity with the appropriate status as a burner of hazardous waste fuel marked in Section VIII.A of EPA form 8700-12.
 - b) A signed and dated original copy of the following certification by a responsible corporate officer as defined at §270.11:

"I certify under penalty of law that hazardous waste has not been burned or processed in onsite boilers and industrial furnaces at this facility since August 21, 1991, nor will be in the future without a proper permit. This information was prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manages the facility, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, I am aware that there are significant and complete. penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

FACT SHEET

HITACHI SEMICONDUCTOR U2 FACILITY Irving, Texas EPA ID# TXD982556524

- * Hitachi submitted of a Notification of Regulated Waste Acivity dated May 14, 1991.
- * Hitachi's May 14, 1991 notification included an onsite industrial boiler utilizing hazardous waste as fuel.
- * Hitachi failed to submit a Part A and a Certification of Precompliance by the August 21, 1991 regulatory deadline required for notifiers planning to continue to burn hazardous waste in a boiler or industrial furnace.
- * Hitachi was referred to 6H-C by 6H-P on September 12, 1991 as a BIF notifier, potential non-complier.
- * Hitachi claims that between May and August of 1991 a corporate decision was made not to pursue BIF interim status. Hitachi indicates that hazardous wastes have not been burned in an onsite BIF since August 21, 1991.
- * A 3007 information request has been drafted to obtain:
 - information regarding Hitachi's compliance/non-compliance with the BIF rule, and
 - 2) certification that Hitachi has not and does not intend to burn hazardous waste in a BIF.

RECORD OF COMMUNICATION	x	Phone call	Conference	DATE:	4/2/92
COMMUNICATION		Discussion	Other	TIME:	9:20 AM
O: Hitachi File, T	XD9	82556524 FRC	M: Bryon Hei	neman,	6H-CX

Background:

Hitachi Semiconductor submitted a revised 8700-12 notification form for BIF activity at their U2 facility in Irving, Texas. The notification was date stamped received in the Region on June 17, 1991. The cover letter submitted by Mr. Clay with this notification indicated that Hitachi intended to submit the required Part A application and Certification of Precompliance by August 21, 1991. Neither of these subsequent documents have been received by the Region. Mr. Clay was contacted to ascertain the need for a 3007 information request.

Summary of Communication:

Mr. Clay indicated that the U2 facility is a semiconductor facility and generates waste solvents IPA, methanol, and others (D001, D002, F003). These solvents are currently stored onsite, and disposed of offsite by Gilbraltar Resources, a fuel blender. The U2 facility operates a natural gas fired boiler onsite. Hitachi had submitted the BIF notification with the intent of utilizing the onsite boiler for the generated waste streams. Mr. Clay indicated that Hitachi has not pursued BIF activity because of the recent Texas moratorium on hazardous waste permits. Mr. Clay claimed that Hitachi has not burned hazardous waste in its boiler. He asked if BIF activity could still be pursued. I referred him to Ruben Casso of 6H-P.

Conclusions, action taken or required: Recommend 3007 information request.

Information copies to: Keith Phillips, 6H-CX, Guy Tidmore, Agatho Benjamin, 6H-CT, Ruben Casso, 6H-PT.



Hitachi Semiconductor (America) Inc.

P.O. Box 167928 6321 East Campus Circle Drive Irving, Texas 75016-7928 Telephone: (214) 518-1501 METRO (214) 751-1610 FAX (214) 550-8972

May 14, 1991

Mr. Ruben Casso EPA Region VI 1445 Ross Avenue, 12th Floor Suite 1200 Dallas, Texas 75202

Re:

Burning of Hazardous Waste In Boilers and Industrial Furnaces Notification of Regulated Waste Activity EPA ID Number TXD982556524

Dear Mr. Casso:

In compliance with the recently revised BIF Regulation, 40 CFR Part 260, Hitachi Semiconductor (America), Inc. wishes to submit the completed Section 3010 Notification, Form 8700-12 (7/90). By submitting this form, Hitachi will meet the May 22, 1991 deadline required as part of applying for Interim Status at the U2 Facility.

Currently, Hitachi is listed as a generator of the waste solvents listed in the attached form and is currently permitted to dispose of these materials. At Hitachi's U2 Facility, an active boiler currently exists, burning natural gas and is registered with the Texas Air Control Board (TACB) under a permit exemption. Hitachi will submit the required Part A application and other necessary requirements by the next deadline, August 21, 1991. After Interim Status is granted, Hitachi intends to convert the active boiler for recycling these hazardous wastes on-site by incineration for generating steam or heat to be utilized rather than disposing of these hazardous wastes off-site.

Hitachi Semiconductor (America), Inc. hopes that you find the enclosed information sufficient to comply with the requirements necessary to obtain Interim Status for the existing boiler. Hitachi is currently scheduling the preparation of the Part A application and public notification as required.

Mr. Ruben Casso May 14, 1991 Page 2

Should you have any questions or comments concerning the above, please call me at (214) 580-0088.

Sincerely,

HITACHI SEMICONDUCTOR (AMERICA), INC.

Jim Clay

Facilities Engineer

Encl.

cc: Mr. Wayne Harry - Texas Water Commission

Approved. OMB No. 2050 0028, Expires 10 -31-91 GSA No. 0246-EPA-OT

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

& EPA

Notification of Regulated Waste Activity

Date Received (For Official Use Only)

United States Environmental Protection Agency

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	ID - For Official Use Only
VIII. Type of Regulated Weste Activity (Mark X' in the appropriate box	and the second s
A. Hazardous Waste Activity	B. Used Oil Fuel Activities
1. Generator (See Instructions) a. Greater then 1000kg/mo (2.200 lbs.) b. 100 to 1000 kg/mo (220 - 2.200 lbs.) c. Less then 100 kg/mo (220 lbs.) 4. Hazardous Waste Fuel a. Generator Marketin 2. Transporter (Indicate Mode in boxes 1-5 below) b. For commercial purposes Mode of Transportation 1. Air 2. Rail 3. Highway 5. Underground injection 4. Water 5. Other - specify	a. Generator Merketing to Burner ctions. b. Other Markerer c. Burner - indicate device(s) - Type of Combustion Device device(s) - 1. Utility Boiler 2. Industrial Formsce coller c. Specification Used Oil Fuel Marketse (or Organize Burner) Who First Claim
IX. Description of Regulated Wastes (Use additional sheets if necessary	ery)
A. Characteristics of Nonlisted Hazardous Wastes. Mark X' in the boxes corre- wastes your installation handles. See 40 CFR Parts 261.20 - 261.24)	responding to the characteristics of nonlisted hezerdous
Ignitable 2. Corrosive 3. Reactive 4. Toxicity	
(D001) (D002) (D003) Characteristic (List speci	cific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))
B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if your	need to list more than 12 waste codes.)
2 3	4 5 6
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7 8 9	10 11 12
C. Other Wastes. (State or other wastes requiring an I.D. number. See Instruction	ons.)
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certify under penalty of law that I have personally examined and a land all attached documents, and that based on my inquiry of a potaining the information, I believe that the submitted information that there are significant penalties for submitting false information imprisonment.	those individuals immediately responsible for ion is true, accurate, and complete. I am aware
gnature Name and Official Title (type of Jim Clay, Facilities)	-1,-10,
1. Comments	A CANADA A SANCE AND A SANCE
	The Control of the Co

TSD Facility Permit # 38530 G 1 Report for: 12 19 91 TAXPAYER IDENTIFICATION NUMBER The disclosure of your Taxpayer Identification Number, solicited in accordance with Section 7(b) of the Privacy Act of 1974 is voluntary. Your assistance in our efforts to improve our service by providing your Taxpayer Identification Number is appreciated.	Y GENERATED UNITS * Enter one letter: G * gallons, L * litters, P *, pounds, L *, pounds, L * litters, P *, pounds, L *,	Y GENERATED UNITS Fig. 1 S G S G S S C C C C S S C C	Y GENERATED UNITS • Enter one letter: G = gallons, L = litters, P = pounds, - T = Lons (Podo II), Y = cubic yards, R < Alfograms, M = Lons (Podo II), Y = cubic yards, R < Alfograms, M = C A I	monitoring and maintenance. (Disposal facilities only)
ANNUAL WASTE SUMMARY TSD Factility FOR DATA YEAR: 1991 Page 1 of 3 Your TXD982556524	TOTAL QUANTITY EPAID # COMMENTS 16 16 17 18 19 19 19 19 19 10 10 10 10 10	TOTAL QUANTITY COMMENTS SB B B R L T R C H E N D I N G I N V E N T SB SB SB SB SB SB SB SB SB SB	TOTAL QUANTITY 18 18 18 19 18 19 19 10 10 10 10 10 10 10 10	ACILITI
EXAS WATER COPTAINS FOR THE SEMENT SECTION AZARDOUS AND SOLID WASTE DIVISION O. BOX 13087, CAPITOL STATION USTIN, TEXAS 78711-3087 TELEPHONE: (\$12) 483-8175 HITACHI SEMICONDUCTOR (AMERICA) JAMES S. CLAY P.O. BOX 167928 EXERNAMENTATIVING, Texas 75016-7928 (214) 580-0088	SOLVENT MIXIURE, SPENT SOLVENT AMPLING OUT OF STATE	S S S S S S S S S S	PHOTO RESIST	COST ESTIMATES TO BE COMPLETED BY OWNER/OPERATOR OF HAZARDOUS WASTE MANAGEMENT FA A. Cost estimate for facility closure \$

James S. Clay

TAXPAYER IDENTIFICATION NUMBER	The disciosure of your taryayar accordance with Section 7(b) of the Privacy Act of 1974 is voluntary. Your assistance in our efforts to improve our service by providing your Taxpayer Identification Number is appreciated.	TOTAL QUANTITY GENERATED UNITS * Enter one letter: G_gallons, L_liters, P=pounds, T = lons (2000 lb), Y=cubic yards, K = kilograms, M = metric tons (1000 Kg), N = cubic meters M = metric tons (1000 Kg), N = cubic meters * Only applicable for Hazardous and Class I Industrial Wassh	AICAL RESQUEGES, INC.	OUANTITY GENERATED UNITS * Enter one letter: G * gallons, L * liters, P * pounds, T * lons (2000 lb), Y * cubic yards, K * kilograms, M * metric tons (1000 Kg), N * cubic meters ** Only applicable for Hazardous and Class I Industrial Wass	MICA	0 R Y 19 9 1	TOTAL QUANTITY GENERATED UNITS • Enter one letter: G = gallons, L liters. P = pounds, T * lons (2000 lb), Y = cubic yards, K = kilograms. M = metric tons (1000 Kg), N = cubic meters M = metric tons (1000 Kg), N = cubic meters M = metric tons (1000 Kg), N = cubic meters M = metric tons (1000 Kg), N = cubic meters M = metric tons (1000 Kg), N = cubic meters M = metric tons (1000 Kg), N = cubic meters		тову 119911	FACILITIES monitenance. (Disposal facilities only)	I certify that I am not required to submit an annual waste summary bec. I meet all the conditions in 31 TAC 335.9 (a)(3).	
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TSD Facility Permit "

ANNUAL WASTE SUMMAHY

Permit # 305350 [2 2 2 19 2 19 2 10 10 10 10 10 10 10	The disclosure of your Taxpayer Identification Number, solicited in accordance with Section 7(b) of the Privacy Act of 1974 is voluntary. Your assistance in our efforts to improve our service by providing your Taxpayer Identification Number is appreciated.	A B B B B B B B B B	ENERATED UNITS * Enter one letter: G = gallons, L = liters, P = pounds, T = lons (2000 lb), Y = cubic waters, K = kilograms, M = metric tons (1000 Kg), N = cubic meters * O N ME E N T A L K A N S A S C I T Y, M ** Only applicable for Hazardous and Class I Industrial Waster. ** O N ME E N T A L K A N S A S C I T Y, M ** O N ME E N T A L K A N S A S C I T Y, M ** O N ME E N T A L K A N S A S C I T Y, M ** O N ME E N T A L K A N S A S C I T Y, M ** O N ME E N T A L K A N S A S C I T Y, M ** O N ME E N T A L K A N S A S C I T Y, M ** O N ME E N T A L K A N S A S C I T Y, M ** O N ME E N T A L K A N S A S C I T Y, M ** O N ME E N T A L K A N S A S C I T Y, M ** O N ME E N T A L K A N S A S C I T Y, M ** O N ME E N T A L K A N S A S C I T Y, M ** O N ME E N T A L K A N S A N S A S C I T Y, M ** O N ME E N T A L K A N S A N S A S C I T Y, M ** O N ME E N T A L K A N S A N S A S C I T Y, M ** O N ME E N T A L K A N S A N S A S C I T X, M ** O N ME E N T A L K A N S A N S A S C I T X, M ** O N ME E N T A L K A N S A N	ENERATED UNITS • Enter one letter: G - gallone, L - liters, P * pounds, L - l	FACILITIES monitoring and maintenance. (Disposal facilities only) all I certify that I am not required to submit an annual waste summary because I I meet all the conditions in 31 TAC 335.9 (a)(3).
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ASSESSMENT SECTION AND SOLID WASTE DIVISION A 13087, CAPITOL STATION LIN, TEXAS 18111-3087 TELEPHONE: (512) A63-8175	HITACHI SEMICONDUCTOR (AMERICA) JAMES S. CLAY P.O. BOX 167928 KXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	1 1 2 4 4 5 4 6 6 7 7 7 7 7 7 7 7	SOLVENTES NON-HALOGENATED SOLVENTS, NON-HALOGENATED SOLVENTES SOLVENTES NON-HALOGENATED SOLVENTES SOLVEN	ILVENTS, Non-HALOGENATEL TS FACILITY CODE ** OUT OF S 3 8 5 3 0 S 0 2 43 46	COST ESTIMATES TO BE COMPLETED BY OWNER/OPERATOR OF HAZARDOUS WASTE MANAGEMENT FA A. Cost estimate for facility closure A. Cost estimate for facility closure S. Cost estimate for post closure me S. Cost estimate for po

TSD Facility Permit # (30330 | Value | Heport 101: | 142 | 19

ANNUAL WASTE SUMMARY

Form. ** ved. OMB No. 2050-0028. Expires 10-31-91

GSA NO. 0246 - FP4-OT

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is

Notification of Regulated Waste Activity

Date Received (For Official Use Only)

required by law (Section 3010 of the Resource Conservation and Recovery Act). United States Environmental Protection Agency RY. I. Installation's EFA ID Number (Mark 'X' in the appropriate box) 629.9 C. Installation's EPA ID Number DA. A. First Notification B. Subsequent Notification 5 2 5 4 6 (complete item C) 7.22 II. Name of Installation (Include company and specific site name) h III. Location of Installation (Physical address not P.O. Box or Route Number) Street 3 1 4 Street (continued) City or Town State ZIP Code V County Code County Name IV. Installation Mailing Address (See Instructions) Street or P.O. Box 0 0 City or Town State ZIP Code i r V: Installation Contact (Person to be contacted regarding waste activities at site) "本一","他们是自己的"人","在一个 Name (last) (first) Job Title HAM WOUTH AND Phone Number (area code and number) a i n VL Installation Contact Address (See Instructions) A. Contact Address B. Street or P.O. Box A CHARLEST AND A CONTRACTOR Mailing. X City or Town State ZIP Code VII. Ownership (See Instructions) A. Name of Installation's Legal Owner C d Street, P.O. Box, or Route Number 等的是 化 地名美国 0 9 0 6 City or Town arte de grante e Egypte Kj The state of the s State ZIP Code **B.** Land Type C. Owner Type D. Change of Owner (Date Changed) Month Day Phone Number (area code and number) Indicator Year

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and all attached documents obtaining the information, I be	that I have personally examined and am f is, and that based on my inquiry of tho believe that the submitted information i enalties for submitting false informati	se Individuals immediately respons s true, accurate, and complete. I an
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Hitachi Semiconductor (America) Inc.

P.O. Box 167928 6321 East Campus Circle Drive Irving, Texas 75016-7928 Telephone: (214) 518-1501 METRO (214) 751-1610 FAX (214) 550-8972

May 14, 1991

Mr. Ruben Casso EPA Region VI 1445 Ross Avenue, 12th Floor Suite 1200 Dallas, Texas 75202

Re:

Burning of Hazardous Waste In Boilers and Industrial Furnaces

Notification of Regulated Waste Activity

EPA ID Number TXD982556524

Dear Mr. Casso:

In compliance with the recently revised BIF Regulation, 40 CFR Part 260, Hitachi Semiconductor (America), Inc. wishes to submit the completed Section 3010 Notification, Form 8700-12 (7/90). By submitting this form, Hitachi will meet the May 22, 1991 deadline required as part of applying for Interim Status at the U2 Facility.

Currently, Hitachi is listed as a generator of the waste solvents listed in the attached form and is currently permitted to dispose of these materials. At Hitachi's U2 Facility, an active boiler currently exists, burning natural gas and is registered with the Texas Air Control Board (TACB) under a permit exemption. Hitachi will submit the required Part A application and other necessary requirements by the next deadline, August 21, 1991. After Interim Status is granted, Hitachi intends to convert the active boiler for recycling these hazardous wastes on-site by incineration for generating steam or heat to be utilized rather than disposing of these hazardous wastes off-site.

Hitachi Semiconductor (America), Inc. hopes that you find the enclosed information sufficient to comply with the requirements necessary to obtain Interim Status for the existing boiler. Hitachi is currently scheduling the preparation of the Part A application and public notification as required.

JUN | 7 | 199

RCRA PROGRAMS

Mr. Ruben Casso May 14, 1991 Page 2

Should you have any questions or comments concerning the above, please call me at (214) 580-0088.

Sincerely,

HITACHI SEMICONDUCTOR (AMERICA), INC.

Jim Clay

Facilities Engineer

Encl.

cc: Mr. Wayne Harry - Texas Water Commission



Tolly Girlinghouse 210 S/Sgt Macario Garcia Houston, Texas 77011 December 18, 1990

1XD 982563868

RV 6.30.91 DA. 7.22.91

> Mr. Allen P. Beinke, Jr. TEXAS WATER COMMISSION P. O. Box 13087 Capital Station Austin, Texas 78711-3087

Dear Mr. Beinke:

Please be advised Nasco Engine, Inc. is out of pure 910506
Sincerely, business.

Tolly Girlinghouse

TG:sek



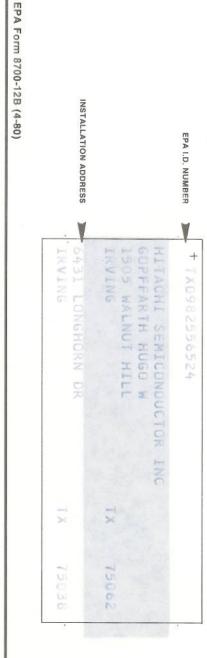
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Entered by: KF 9/13/88	Date Entered:	-	

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ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a of the Resource Conservation and Recovery Act(RCRA). Your EPA Identification Number documents required under Subtitle C of RCRA. the installation located at the address shown in the box below to comply with Section 3010 Federal Hazardous Waste Permit; and other hazardous waste management reports and included on all shipping manifests for transporting hazardous wastes; on all Annual This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for for that installation appears in the box below. The EPA Identification Number must be



RF. 8. 48

Please print or type with ELITE type (12 characters, inch) in the unshaded areas only

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United States Environmental Protection Assets

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EPA Form 8700-12 (Rev. 11-85) Reverse